



# Telangana Vidhyut Joint Action Committee (TGVJAC)

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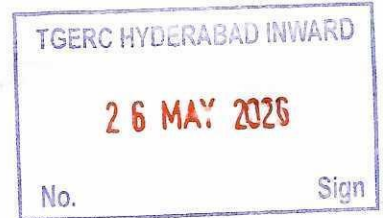
Dt: 21. 05.2026

To

The Hon'ble Chairman.

Telangana Electricity Regulatory Commission  
Hyderabad.

Respected Sir,



Sub:- TGVJAC- Submission of Views and Objections regarding Grant of  
Distribution License to Telangana Rythu Power Distribution  
Company Limited (TGRPDCL)- Reg

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Averting to the subject cited it is to submit that, TGVJAC represents the employees of TGNPDCL, TGSPDCL, TGTRANSCO, and TG GENCO — the very men and women who have, for decades, built, maintained, and operated the power infrastructure of Telangana with dedication and sacrifice.

TGRPDCL has filed an application on 06 April 2026 before the Telangana Electricity Regulatory Commission (TGERC) seeking a Distribution Licence under Section 14 of the Electricity Act, 2003 read with TGERC (Distribution Licence) Regulation No. 4 of 2016. The company was incorporated vide CIN: U35100TS2026SGC213226, constituted by G.O.Ms.No.44 (Energy Department, 17 December 2025) and formally created as a company by G.O.Ms.No.4 (Energy Department, 11 March 2026).

TGVJAC's position is **conditional support** — we are not opposed to the welfare of farmers and agricultural consumers, which is a noble objective. However, we place on record, before this distinguished gathering, our deep concerns regarding the **process, protections, and precautions** that must accompany the formation of TGRPDCL, without which the new entity risk becoming a financial burden on the State while leaving thousands of employees in uncertainty.

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## **2. ABOUT TGVJAC – OUR STANDING AND MANDATE**

|                                |                                                                                                                                                                                                                                                                |
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| <b>Organization</b>            | Telangana Vidhyut Joint Action Committee (TGVJAC)                                                                                                                                                                                                              |
| <b>Constituent Bodies</b>      | TGNPDCL   TGSPDCL   TGTRANSCO   TGGENCO                                                                                                                                                                                                                        |
| <b>Nature</b>                  | Joint platform of registered employee associations across Telangana power utilities                                                                                                                                                                            |
| <b>Chairman &amp; Convenor</b> | <b>P. Srinivas</b> , State President, Telangana Accounts Officers Association (Reg. No. 575/2013) , <b>M.Shashi Kuamar</b> , <b>State General Secretary</b> , Telangana Rashtra Power Employees Union (Reg.No.G-445) (Affiliated to Bharathiya Mazdoor Sangh ) |
| <b>Our Mandate</b>             | Protection of employee service conditions, seniority, pension rights, and fair treatment during organizational restructuring                                                                                                                                   |

## **3. FACTUAL BACKGROUND – WHAT IS TGRPDCL?**

TGRPDCL has been formed to serve approximately 29.08 lakh electricity consumers in the categories of agriculture, Lift Irrigation Schemes (LIS), HMWSSB, Mission Bhagiratha, and municipal water supply – presently being served by TGSPDCL and TGNPDCL across the combined territory of Telangana.

The key facts as understood by TGVJAC are as follows:

- TGRPDCL is a State Government Undertaking (SGU) incorporated on 11 March 2026.
- It has applied to TGERC for a Distribution License under Section 14 of the Electricity Act, 2003.
- Its consumer base will be carved out from existing TGSPDCL and TGNPDCL territories.
- Employees will be transferred by appointment-by-transfer from parent DISCOMs to TGRPDCL.
- The transfer guidelines have been issued; however, a legally binding Tripartite Agreement between TGRPDCL, the parent DISCOMs, and employees has NOT yet been executed.
- Agricultural consumers currently receive heavily subsidized or free supply – the cost of which is borne by parent DISCOMs through subsidy reimbursements from the State Government.

## **4. ISSUES AND CONCERNS – TGVJAC'S POSITION**

TGVJAC places the following issues before the workshop for informed debate and regulatory attention:

### **4.1 Employee Service Protection – Non-Negotiable Demand**

The most critical issue for TGVJAC is the service protection of employees transferred to TGRPDCL. Our specific demands are:

- A **legally binding Tripartite Agreement** must be executed between TGRPDCL, parent DISCOMs (TGSPDCL/TGNPDCL), and employee representatives BEFORE the distribution licence is granted and operational transfer commences.
- All **seniority rights** accrued in the parent DISCOM must be fully protected and carried forward without interruption or recomputation.
- Employees appointed before 01.09.2004 must be entitled to the **Old Pension Scheme (OPS)** as upheld by the Telangana High Court — this entitlement must be explicitly guaranteed in TGRPDCL's service rules.
- Promotions, pay scales, and service benefits must be at **par or better** than parent DISCOM terms — no employee must suffer a disadvantage by virtue of transfer to TGRPDCL.
- A **right of repatriation** must be guaranteed — if TGRPDCL becomes financially unviable or is dissolved, employees must automatically revert to parent DISCOMs without break in service.

#### **4.2 Financial Viability — A Structural Concern**

TGVJAC expresses serious concern about the long-term financial viability of TGRPDCL. The agricultural consumer segment is structurally loss-making in any DISCOM model:

- Agricultural consumers receive supply at zero or heavily subsidised tariffs. TGRPDCL will inherit this entire subsidised segment without the cross-subsidy benefit from industrial/commercial consumers who remain with TGSPDCL and TGNPDCL.
- TGRPDCL's revenue will be **almost entirely dependent on State Government subsidy reimbursements**. Any delay or reduction in subsidy releases will directly threaten employee salaries, pensions, and operational capacity.
- Parent DISCOMs — TGSPDCL and TGNPDCL — already carry **massive accumulated financial losses**. Carving out agricultural consumers will further erode their revenue base and cross-subsidy pool, worsening their financial health.
- TGVJAC urges TGERC to conduct a **rigorous financial viability assessment** of TGRPDCL's proposed revenue model before granting the distribution licence — including stress-testing scenarios where State subsidy releases are delayed by 3 to 6 months.

#### **4.3 Agricultural Connection Regularisation — Pending Crisis**

TGVJAC flags the massive backlog of pending agricultural service connections as an urgent issue that TGRPDCL must address. The transfer of this responsibility must come with adequate infrastructure, manpower, and financial allocation:

- Thousands of pending agricultural connection applications remain unserved in both TGSPDCL and TGNPDCL territories.
- TGRPDCL must inherit a **clear, audited list** of pending applications with committed timelines for release — not merely the liability without the resources.
- The capital expenditure required for new connections must be **ring-fenced and separately funded** by the State Government — it must not become an additional burden on TGRPDCL's operational budget.

#### 4.4 Asset and Liabilities Transfer – Clarity Required

- The transfer of assets (substations, feeder lines, transformers, AMR meters, vehicles) from parent DISCOMs to TGRPDCL must be based on a **transparent, independently audited valuation**.
- Existing **loan obligations and power purchase agreements** that serve agricultural feeders must be clearly allocated – ambiguity here will create long-term financial and legal disputes.
- TGERC must stipulate clear asset-liability transfer protocols as a **pre-condition for granting the distribution licence**, not as a post-licensing arrangement.

#### 4.5 Regulatory Oversight – TGERC's Critical Role

TGVJAC strongly urges TGERC to exercise its full statutory powers in the following areas:

- The licence application must be subjected to a **full public hearing process**, with adequate time for all stakeholders – including employee unions – to file objections and suggestions.
- TGERC must specify **performance standards, service quality benchmarks, and penalty provisions** in the licence conditions – TGRPDCL must not be given a licence without enforceable obligations.
- **Annual financial and performance audits** of TGRPDCL must be mandated and their findings placed in the public domain.
- TGERC must ensure that **tariff principles for agricultural consumers** are clearly defined – including the mechanism for subsidy pass-through and the tariff revision cycle.

#### 4.6 Constitutional and Labour Rights – Article 14 and 16

TGVJAC invokes **Articles 14, 16(1), and 16(2)** of the Constitution of India. Employees transferred to TGRPDCL are entitled to equality of opportunity in public employment. Their seniority, service conditions, and career progression must not be adversely affected by an administrative restructuring decision in which they had no meaningful say. This position is backed by the Hon'ble Supreme Court's ruling in *Ajit Singh vs. State of Punjab (1999)* which protects seniority rights of employees during inter-departmental transfers and reorganisations.

#### 5. TGVJAC'S FORMAL SUGGETIONS AND VIWS BEFORE THE TGERC

TGVJAC places the following **SUGGETIONS AND VIWS**, before TGERC and the Government of Telangana:

8. Execute a **legally binding Tripartite Agreement** guaranteeing service protection for all transferred employees – before TGRPDCL commences operations.
9. Restore the **Old Pension Scheme (OPS)** for all employees appointed before 01.09.2004, in compliance with the Telangana High Court order, across all power sector entities including TGRPDCL.
10. Ensure **seniority continuity** – the 4-tier seniority cascade framework in the transfer guidelines must be implemented transparently, with a grievance redressal mechanism.
11. Guarantee a **right of repatriation** to the parent DISCOM for all transferred employees.
12. TGERC must mandate **financial viability assessment** and public hearing before granting the distribution licence to TGRPDCL.

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13. All **pending agricultural connections** must be regularized with dedicated capital funding – not transferred as an unfunded liability.
14. Parent DISCOMs – TGSPDCL and TGNPDCL – must be **financially ring-fenced** from losses arising out of the TGRPDCL formation process.

## 6. OUR GUIDING PRINCIPLE

TGVJAC is guided by the principle: "*Manavata e Devudu – Humanity is God.*" We believe that true public service means ensuring dignity for every stakeholder – the farmer who needs reliable power, the consumer who depends on quality supply, and the employee who has devoted a lifetime to making that supply possible. A TGRPDCL built on fairness, financial discipline, regulatory accountability, and respect for employee rights will be a lasting gift to Telangana's farmers. A TGRPDCL built on haste, ambiguity, and unprotected transfers will be a burden on the State and a betrayal of its employees.

TGVJAC commits to constructive engagement with the Government, TGERC, and civil society organizations and urges all stakeholders in this workshop to ensure that TGRPDCL is built right, not merely built fast.

## 7. CONCLUSION

- That the Distribution License to TGRPDCL be granted only after a Tripartite Agreement is executed and financial viability is independently certified.
- That all employee service conditions be protected by statutory instrument – not merely by administrative order which can be revised unilaterally.
- That TGERC's licensing process for TGRPDCL be made fully participatory, with structured opportunity for employee unions, farmer groups, and civil society to file objections and suggestions.
- That the Government of Telangana release adequate and timely subsidy reimbursements to TGRPDCL to ensure its operational sustainability and that this obligation be made legally enforceable.

Thanking you sir

Yours Sincerely,

(M.SHASHI KUMAR)

Convenor  
TGVJAC